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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION**

**KLAMATH-SISKIYOU WILDLANDS
CENTER, CASCADIA WILDLANDS, and
OREGON WILD,**

Plaintiffs,

v.

**UNITED STATES BUREAU OF
LAND MANAGEMENT,**

Defendant.

Case No. 1:24-CV-01930-CL

**JOINT STATUS REPORT;
MOTION TO LIFT STAY**

The Parties hereby provide this joint status report and move to lift the stay in this case.

ECF No. 7.

On November 19, 2024, Plaintiffs filed this case challenging BLM's issuance of the Last Chance Environmental Assessment ("EA"), Finding of No Significant Impact, and Decision Record for the Last Chance Forest Management Project ("Last Chance Project" or "Project")

under the Administrative Procedure Act. *See* Pls’ Complaint, ECF No. 1 at ¶ 1. Plaintiffs allege violations of the Federal Land Policy and Management Act, and the National Environmental Policy Act (“NEPA”). *Id.*

On January 17, 2025, the Parties filed a joint motion to stay which indicated BLM’s decision to conduct additional analysis and prepare a new NEPA document and decision record for the Last Chance Project. ECF No. 6. “[U]ntil the additional NEPA analysis and decision-making is complete,” BLM agreed to not engage in various ground disturbing activities, conduct additional auctions, or award any final contracts. *Id.* The Court granted the Parties’ motion and stayed all pending deadlines until further notice. ECF No. 7.

BLM and Plaintiffs filed a joint status report on April 22 updating the Court on the administrative process, including the public comment period for the Revised EA. ECF No. 9. On April 23, the Court ordered a further Joint Status Report on June 23, or within 14 days of the publication of a final decision record, whichever came sooner. ECF No. 10.

BLM hereby notifies the Court that a decision record consistent with the Revised EA was signed on May 12.¹ This decision record (DR #1) authorizes the Paul’s Payoff timber sale and the Rotor’s Up timber sale. BLM anticipates that the contract related to Paul’s Payoff timber sale will be awarded in the next few weeks, but Pending Defendant-Intervenor Murphy Company has indicated that roadwork will not begin until mid-August. The Rotor’s Up timber sale is scheduled for auction at the end of June.

Additionally, Plaintiffs intend to amend their Complaint. ECF No. 1. BLM does not oppose amendment.

¹ <https://eplanning.blm.gov/eplanning-ui/project/2017275/510>. A second decision record not relevant to the claims in this case was also signed on May 12.

Intervention. Murphy Company intends to move to intervene on behalf of Defendants. Counsel for Murphy Company has communicated with counsel for Plaintiffs and Defendant and agrees to abide by the schedule set by the Parties below. BLM takes no position on intervention. Plaintiffs and Murphy Company are currently conferring on Plaintiffs' position on intervention.

The Parties propose the following schedule for further proceedings.

June 6, 2025	Plaintiffs file Amended Complaint
July 2, 2025	Defendant files Response to Plaintiffs' Amended Complaint
July 18, 2025	Defendant lodges Administrative Record with Court and Parties ²
August 14, 2025	Plaintiffs file Motion for Summary Judgment
September 12, 2025	Defendant files Cross-Motion for Summary Judgment and Response to Plaintiffs' Motion
September 26, 2025	Pending Defendant-Intervenor files Cross-Motion for Summary Judgment and Response to Plaintiffs' Motion
October 10, 2025	Plaintiff files Response to Defendant's Cross-Motion and Reply in support of Plaintiffs' Motion for Summary Judgment
October 31, 2025	Defendant files Reply in support of Defendant's Cross-Motion for Summary Judgment
November 10, 2025	Pending Defendant-Intervenor files Reply in support of Cross-Motion for Summary Judgment

The Parties therefore request that the Court lift the stay and enter the above schedule.

Respectfully submitted this 27th day of May, 2025.

² Before lodging the Administrative Record with the Court, Defendant will share an index of the Administrative Record informally with counsel for the Parties. The deadlines for a motion to supplement the record, if any, will be co-extensive with the briefing schedule for summary judgment, along with any responses. The Parties will confer and make best efforts to resolve any record disputes prior to summary judgment briefing.

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/s/ Alexis G. Romero

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CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2025, a copy of the foregoing Joint Status Report and Motion to Lift Stay was served by electronic means on all counsel of record by the Court's CM/ECF system.

/s/ Alexis G. Romero

ALEXIS G. ROMERO